

1 KIMBERLY MAXSON-RUSHTON  
2 Nevada Bar #005065  
3 COOPER LEVENSON APRIL  
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4 Las Vegas, Nevada 89101  
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5 FAX: (702) 366-1857  
Attorneys for Defendant  
6 SUN CAB, INC. dba NELLIS CAB COMPANY

7 **UNITED STATED DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 THEODORE TRAPP, on his own behalf and  
on behalf of all others similarly situated,

CASE NO. 2:09-cv-00995  
DEPT NO.:

10 Plaintiff,

11 vs.

12 BIG POPPA'S, LLC, a Nevada limited  
liability company d/b/a BADDA BING  
13 MEN'S CLUB; SKY TOP VENDING, INC.,  
a Nevada Corporation d/b/a CAN CAN  
14 ROOM; LA FUENTE, INC., a Nevada  
corporation d/b/a CHEETAS'S; C.P. FOOD  
15 AND BEVERAGE, INC., a Nevada  
corporation d/b/a CLUB PARADISE; DÉJÀ  
16 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
Nevada limited liability company d/b/a DÉJÀ  
17 VU SHOWGIRLS; PALOMINO CLUB,  
18 INC., a Nevada corporation d/b/a PALOMINO  
CLUB; SHAC, LLC, a Nevada limited  
19 liability company d/b/a SAPPHIRE; K-KEL,  
INC., a Nevada corporation d/b/a  
20 SPEARMINT RHINO; D2801 WESTWOOD,  
INC., a Nevada corporation d/b/a  
21 TREASURES; LITTLE DARLINGS OF LAS  
VEGAS, LLC, a Nevada limited liability  
22 company d/b/a LITTLE DARLINGS; O.G.  
ELIADES, A.D., LLC, a Nevada limited  
23 liability company d/b/a OLYMPIC  
GARDENS; LAS VEGAS  
24 ENTERTAINMENT, a Nevada limited  
liability company d/b/a LARRY FLYNT'S  
25 HUSTLER CLUB; MICHAEL A. SALTMAN  
d/b/a MINXX; RICK'S LAS VEGAS; FRIAS  
26 MANAGEMENT, LLC, a Nevada limited  
liability company d/b/a ACE CAB  
COMPANY and A-NORTH LAS VEGAS  
27 CAB; WESTERN CAB COMPANY, a  
28 Nevada corporation d/b/a WESTERN CAB

**DEMAND FOR SECURITY OF COSTS**

Date of Hearing: N/A

Time of Hearing: N/A

1 COMPANY and WESTERN LIMOUSINE;  
2 NEVADA CHECKER CAB  
3 CORPORATION, a Nevada corporation d/b/a  
4 CHECKER CAB COMPANY; NEVADA  
5 STAR CAB CORPORATION, a Nevada  
6 corporation d/b/a STAR CAB COMPANY;  
7 NEVADA YELLOW CAB CORPORATION,  
8 a Nevada corporation d/b/a YELLOW CAB  
9 COMPANY; LUCKY CAB COMPANY OF  
10 NEVADA, a Nevada corporation d/b/a  
11 LUCKY TRANS; SUN CAB, INC., a Nevada  
12 corporation d/b/a NELLIS CAB COMPANY;  
13 CLS NEVADA, LLC, a Nevada limited  
14 liability company d/b/a CLS  
15 TRANSPORTATION LAS VEGAS; ON  
DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
SERVE OF LAS VEGAS; DESERT CAB,  
INC. a Nevada corporation d/b/a DESERT  
CAB COMPANY and ODYSSEY  
LIMOUSINE; BELL TRANS A NEVADA  
CORPORATION, a Nevada corporation d/b/a  
BELL TRANS; TONY CHONG, and  
individual; and DOE EMPLOYEES 1-1000;

14  
15 Defendants.

16 TO: THEODORE TRAPP, Plaintiff; and  
17 TO: JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,  
18 ESQ., Attorneys for Plaintiff;

19 Pursuant to NRS 18.130, SUN CAB, INC. dba NELLIS CAB COMPANY hereby makes  
20 demand upon Plaintiff, who resides out of State, for security in the amount of Five Hundred and  
21 No/100 Dollars (\$500.00) for costs and charges which may be awarded herein against Plaintiff. The  
22 requirements of NRS 18.130 apply to actions in the United States District Court,

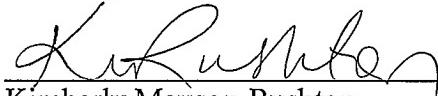
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1 District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988); Hamar v.  
2 Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

3 Dated this 23day of June, 2009.

4 COOPER LEVISON APRIL  
5 NIEDELMAN & WAGENHEIM, P.A.  
6

7 By

  
8 Kimberly Maxson-Rushton

9 Nevada Bar No. 005065

10 900 South Fourth Street

11 Las Vegas, Nevada 89101

12 Attorneys for Defendant

13 SUN CAB, INC. dba NELLIS CAB COMPANY

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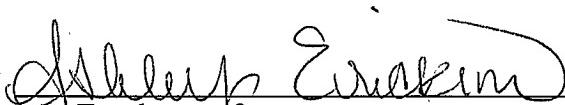
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2                   **CERTIFICATE OF SERVICE**  
3

4                   Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENS  
5                   ON NIEDELMAN & WAGENHEIM P.A. and that on this 24th day of June, 2009, I  
6                   did cause a true copy of the foregoing **DEMAND FOR SECURITY COSTS** to be served via  
7                   CM/ECF electronic filing upon the following person(s).  
8

9                   **Jay Edelson**  
10                  Kamber Edelson LLC  
11                  350 N LaSalle St, Ste 1300  
12                  Chicago , IL 60654  
13                  312-589-6370

14                  **Rafey S. Balabanian**  
15                  KamberEdelson LLC  
16                  350 North LaSalle Street  
17                  Suite 1300  
18                  Chicago , IL 60654  
19                  (312) 589-6370  
20                  Fax: (312) 589-6378  
21                  Email: rafey@kamberedelson.com

22                  **James E Smyth**  
23                  Kummer Kaempfer Bonner Renshaw & Ferrario  
24                  3800 Howard Hughes Parkway  
25                  7th Floor  
26                  Las Vegas , NV 89109  
27                  (702) 792-7000  
28                  Fax: (702) 796-7181  
29                  Email: jsmyth@kkbrf.com

30                  By   
31                  An Employee of  
32                  COOPER LEVENS  
33                  ON NIEDELMAN & WAGENHEIM, P.A.